

August 21, 2017

Regional Freedom of Information Officer
United States Environmental Protection Agency
Region 1 (OARM01-6)
5 Post Office Square, Suite 100
Boston, MA 02109-3912

VIA U.S. MAIL

Dear Sir or Madam:

On behalf of my client, Confectionery Arts International, LLC, a Connecticut limited liability company with a principal place of business at 332 Washington Street, New Britain, Connecticut, I hereby request from you copies of the following public records pursuant to the Freedom of Information Act, 5 U.S.C. § 552:

- An unredacted copy of the complaint against Confectionery Arts International, LLC, referred-to in an email from Christine Sansevero to Mark Potash dated May 8, 2017
- An unredacted copy of the "original message" email forwarded by Ms. Sansevero, dated May 3, 2017 at 2:36pm (hereinafter "the May 3 message"), and listing a "HQ Lead Number" as "FY17-156232-3714-CV" [the forwarded message received by Mr. Potash does not list the "From" or "To" lines of the May 3 message]
- All internal communications between Ms. Sansevero and Darren Fortescue and Robert Girard, respectively, mentioning, discussing, making reference, or relating to the complaint contained in the May 3 message
- All communications between Ms. Sansevero, Mr. Fortescue and/or Mr. Girard, respectively, and the Connecticut Department of Energy & Environmental Protection mentioning, discussing, making reference, or relating to the complaint contained in the May 3 message
- All prior communications received by EPA or internal communications on the subject of or relating to the complaint against Confectionery Arts International prior to the May 3 message, including an unredacted copy of the initial complaint itself if written and different from the May 3 message
- All documents in the EPA's possession referencing, mentioning or listing Confectionery Arts International
- All documents in the EPA file for HQ Lead Number FY17-156232-3714-CV

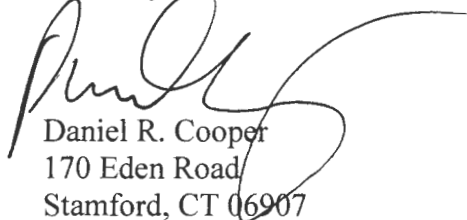
- All written communications from Mr. Michael Nugent or Ms. Pilar Gonzalez Nugent of Indian River Shores, Florida or Vero Beach, Florida

Unless otherwise specified, the term "communications" as used in this request includes, but is not limited to: emails (from business email addresses, personal email addresses, or both), letters, memoranda, telegrams, minutes, hand- or type-written notes, text messages (from business or personal mobile phones), and any other form of document or communication within the scope of the above-stated definition. For these purposes, the word "between" shall mean any communications where one or more EPA staff members, employees or agents is either the sender or a recipient of the subject communication.

We kindly request that all doubts as to whether a given record is subject to this request, those doubts should be resolved in favor of disclosure. Should you have any questions on the subject matter of this request, please do not hesitate to contact me via phone or email.

Thank you in advance for your assistance in this matter. We look forward to hearing from you soon.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Daniel R. Cooper', with a long, sweeping horizontal line extending to the right.

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